



# How to request to use a field fumigant in Ventura County in 2009

California Department of Pesticide Regulation  
Ventura County Department of Agriculture  
February 2009

## Allowances are needed to use these field fumigants between May 1 and October 31:

- ▶ *Methyl bromide*
- ▶ *1,3-Dichloropropene*  
(brand names, Telone, Inline)
- ▶ *Chloropicrin*
- ▶ *Metam-sodium*  
(Vapam, Sectagon),
- ▶ *Potassium N-methyldithiocarbamate*, also called *metam-potassium* (K-Pam)
- ▶ *Dazomet*, also called *tetrahydro-3,5-dimethyl-2H-1,3,5-thiadiazine-2-thione* (Basamid)
- ▶ *Sodium tetrathiocarbonate* (Enzone)

An “emission allowance” is required for Ventura County farmers who plan to apply a fumigant between May 1 and October 31, 2009: These allowances are designed to ensure that emissions of volatile organic compounds (VOCs) from fumigants stay below levels needed to meet federal air quality standards.

- If you plan an application between May 1 and October 31, you must request an allowance from the Department of Pesticide Regulation (DPR), through your County Agricultural Commissioner (CAC). (Farmers who plan to fumigate before May 1 or after October 31 do not need to apply for an emission allowance.)
- After compiling all emission requests from Ventura County, DPR will determine if emission reductions are needed.
- You will then be issued a VOC emission allowance. If it is less than you requested, you must change how you fumigate so emissions are reduced to the allowance level.
- The legal requirement applies to application of any field fumigant listed to the left.

***If you fail to follow these steps, you cannot apply a field fumigant between May 1 and October 31, 2009.***

## How to request a fumigant allowance

1. Determine the fields or areas that you want to fumigate between May 1 and October 31, 2009.
2. Decide the fumigant, application rate, and application methods you will be using to fumigate each field.

You can only use certain low-emission application methods in Ventura County. A list of those methods is on page 6 of this handout. You can also download the list from [www.cdpr.ca.gov](http://www.cdpr.ca.gov), click on “A-Z Index,” then “VOC regulations,” or get the information from the Ventura CAC office.

3. Fill out the attached emission allowance request form. You can also get a copy of the form from DPR’s Web site, [www.cdpr.ca.gov](http://www.cdpr.ca.gov), or from the Ventura County CAC. You can include multiple proposed applications on each form.

## Deadline for allowance requests

The completed allowance request must be received by the Ventura CAC by **March 20, 2009**.

Send the completed form to:

Ventura County Agricultural Commissioner's Office  
Attn: Emission Allowance Request  
P.O. Box 889  
Santa Paula, CA 93061  
Or by fax: 805/525-8922

Or e-mail: [ag.inspector@ventura.org](mailto:ag.inspector@ventura.org) (with subject line: "Emission Allowance Request")

Allowance requests received after March 20, 2009, will not be accepted.

## Information necessary to process your allowance request form

In addition to the information normally required for a restricted materials permit, you will need to include on the allowance request form:

- Commodity to be planted.
- Fumigant product name and U.S. EPA or California registration number.
- Meridian/township/range/section of the area to be fumigated.
- Earliest possible month application will be made. (*Change from 2008.*)
- Latest possible month application will be made. (*Change from 2008.*)
- Fumigation method code (codes are on the back page of this handout, or at [www.cdpr.ca.gov](http://www.cdpr.ca.gov), "A-Z Index," "Fumigation method codes," or ask the Ventura CAC office)
- Acres to be fumigated, application rate per acre, and units (gallons or pounds)

**Note:** Both the amount of fumigated acreage and application rate should be based on entire fields or "broadcast" applications. For fields where only the bedded area is treated and furrows are untreated (or other similar alternating treated-untreated areas), the fumigated acreage is the sum of the treated beds and untreated furrows. Similarly, the application rate is the total pounds of fumigant product applied divided by the sum of bedded acreage and furrow acreage.

## How your emission allowance is determined

The Ventura CAC will send all emission requests to DPR to be compiled. If the amount of fumigant use requested by Ventura County growers would result in the area going above its fumigant emission limit, DPR will impose proportionate reductions. Each grower will then get an emission allowance. The CAC Office will let you know what your emission allowance is no later than May 1, and it will become part of your permit to use the fumigant.

### Assistance for strawberry growers:

IF YOU ARE A STRAWBERRY GROWER, YOU SHOULD CONTACT THE CALIFORNIA STRAWBERRY COMMISSION (CSC). THE COMMISSION WILL PROVIDE TRAINING AND ASSISTANCE WITH CALCULATING EMISSIONS AND WAYS TO MEET YOUR ALLOWANCE.

#### CONTACT:

CSC VENTURA OFFICE  
Ms. ANNIKA FORESTER  
805-798-0271  
OR  
CSC MAIN OFFICE  
Ms. Sofia Hernandez  
831-724-1301

## How to meet your fumigant allowance

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If your allowance is less than you requested, you will need to reduce emissions by doing one or more of the following:

- Reducing fumigated acreage
- Reducing the application rate
- Using an alternative fumigant with a lower emission potential
- Using an alternative fumigation method with a lower emission rating
- Making your applications before May 1 or after October 31.

The simplest way to meet your allowance is to reduce your fumigated acreage or application rate by the same proportion as your request was reduced.

For example, if DPR set your allowance by reducing the original request by 18 percent, you can meet the allowance by reducing the acreage or application rate by the same percentage. If your allowance includes multiple fields, you have the flexibility to divide acreage to be fumigated among the fields as you wish, as long as the total emissions do not exceed your allowance.

You can also meet your allowance by changing the fumigant product or application method to ones with lower emissions, but this is a more complicated calculation.

You can get help in determining which measures will help you meet your allowance by downloading calculation tools and other information from DPR's Web site, [www.cdpr.ca.gov](http://www.cdpr.ca.gov), go to "A-Z Index" and click on "VOC regulations." You can also get information from the Ventura CAC office.

You cannot transfer any of your allowance to another permittee.


## How to request additional fumigant use after receiving your allowance *(change from 2008)*

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DPR and the Ventura CAC have developed a system to reallocate any unused fumigant allowances, beginning in June 2009. There are several ways in which allowances may remain unused. The Ventura CAC will keep track of fumigant emissions, and allowances will be revoked and returned automatically to the county in the following circumstances:

- Early fumigations – Emissions for field fumigations included on a permittee's allowance request that are completed before May 1.
- Tomato and pepper fumigations – Emissions for any tomato or pepper field included on a permittee's allowance request but not fumigated by July 1, 2009, unless the Ventura CAC grants an extension.
- All fumigations completed – Any surplus emissions after a permittee completes fumigation of all the fields included on the allowance request.
- Voluntary returns – Any part of an emission allowance voluntarily returned by a permittee.

To be eligible for additional fumigant use, you must submit a new allowance request form by 4:00 p.m. of the Friday prior to the first Monday of any month from June through October. On the request form, check the box that indicates this is a supplemental request. You do not need to specify the product, rate, or fumigation method for a supplemental request. However, all other information on the request form must be provided. You must also specify the pounds of emissions (not pounds of product) requested. You can get help in determining pounds of emissions by downloading calculation tools and other information from DPR's Web site, [www.cdpr.ca.gov](http://www.cdpr.ca.gov), go to "A-Z Index" and click on "VOC regulations." You can also get information from the Ventura CAC office.



The Ventura CAC will reallocate any unused fumigant allowances at 10:00 a.m. on the first Monday of each month from June through October. If there are sufficient unused allowances available, each permittee will receive one or more 1,000-pound emission allotments (or the amount requested, if less). If there are insufficient unused allowances available, one or more permittees will be selected randomly to receive a 1,000-pound emission allotment (or the amount requested, if less). See the last section of this fact sheet for a detailed description of the reallocation process.

Permittees who receive a supplemental allowance will still be subject to allowance reductions for the types of fumigations discussed above. The Ventura CAC will automatically enroll permittees for the following months' unused allowances if they are not selected or do not receive all of their supplemental request, and can still use an additional allowance (as identified by the latest month specified on the supplemental request).

### **Deadlines for supplemental allowance requests**

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Supplemental allowance requests are due by the following dates:

May 29

July 31

October 2

July 3

September 4

### **How emission limits are enforced**

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You must submit the notice of intent (NOI) at least 48 hours prior to the application for any May – October field fumigation. In addition to the information normally required, the NOI must include the fumigation method code.

When the Ventura CAC office reviews your NOI, it will calculate VOC emissions expected from the application (based on the acreage, product, rate, and method you plan to use). The CAC will subtract the emissions for that application from your allowance. Once you have used up your emission allowance, you will not be allowed to apply a field fumigant again until after October 31.

If your fumigant applications exceed your emission allowance, you would violate the conditions on your permit. Violating permit conditions can result in suspension or revocation of the restricted materials permit and referral to local or state agencies for further enforcement action.

### **Detailed description of reallocation process**

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Unused fumigant allowances for each month (June through October) are reallocated in allotments. Permittees who request less than 1,000 pounds are eligible to receive an allotment equal to the amount of their request. Permittees who request 1,000 pounds or more are eligible to receive one or more 1,000-pound allotments. A single allotment is 1,000 pounds of emissions or the requested amount, if less.

The Ventura CAC distributes the allotments on the first Monday of each month in one or more rounds, as needed. For each round, each permittee is issued a single allotment as long as there are sufficient unused allowances available. When there are insufficient unused allowances available to fully complete a round and distribute an allotment to each permittee, allotments are issued to one or more permittees selected randomly.

Once the available unused allowances are less than a single allotment, the last randomly selected permittee receives the remaining unused allowances, ending the reallocation for that month.

The process is best illustrated by an example. Assume the available unused allowances for August 2009 total 13,400 pounds of emissions, and ten permittees have requested supplemental allowances totaling 19,950 pounds.

***Reallocation Example: August Allotments (pounds) Distributed by Round***

| Permittee               | Pounds Requested | Round 1:<br>13,400 lbs. available | Round 2:<br>5,250 lbs. available | Round 3<br>(random): |
|-------------------------|------------------|-----------------------------------|----------------------------------|----------------------|
| A                       | 200              | 200 ( <i>request fulfilled</i> )  | -----                            |                      |
| B                       | 1,400            | 1,000                             | 400 ( <i>request fulfilled</i> ) | -----                |
| C                       | 3,600            | 1,000                             | 1,000                            | <i>Not selected</i>  |
| D                       | 7,500            | 1,000                             | 1,000                            | 550 (2nd)            |
| E                       | 850              | 850 ( <i>request fulfilled</i> )  | -----                            |                      |
| F                       | 600              | 600 ( <i>request fulfilled</i> )  | -----                            |                      |
| G                       | 1,800            | 1,000                             | 800 ( <i>request fulfilled</i> ) | -----                |
| H                       | 1,200            | 1,000                             | 200 ( <i>request fulfilled</i> ) | -----                |
| I                       | 500              | 500 ( <i>request fulfilled</i> )  | -----                            |                      |
| J                       | 2,300            | 1,000                             | 1,000                            | 300 (1st)            |
| <b>Pounds allotted</b>  |                  | 8,150                             | 4,400                            | 850                  |
| <b>Pounds requested</b> | <b>19,950</b>    | <b>11,800</b>                     | <b>7,400</b>                     | <b>6,550</b>         |

**Round 1:** One round of distribution results in 8,150 pounds being allotted. Since this is less than the available unused allowances at the start of the round (13,400 pounds), each permittee gets one allotment. Six permittees get the maximum of 1,000 pounds, while four are given all they requested and are done.

**Round 2:** The available unused allowances total 5,250 pounds. The second round of distribution now uses up 4,400 pounds. Since this is again less than the available unused allowances at the start of the round, each permittee gets one allotment. Another three permittees receive the balance of their supplemental request and are finished.

**Round 3:** Three permittees remain. Another full round of allotments would distribute 2,300 pounds, but only 850 pounds of available unused allowances remain. Therefore, the allotments are distributed at random, again with a 1,000-pound limit. Permittee J is randomly selected first and receives 300 additional pounds to fulfill the balance of the request for 2,300 pounds. The available allowances total 550 pounds. Permittee D is randomly selected next and receives the remaining 550 pounds (he requested 7,500 pounds and receives a total of 2,550 pounds). The reallocation for August is complete.

For more information on the allowance requirements, visit DPR's Web site, [www.cdpr.ca.gov](http://www.cdpr.ca.gov), click on the red "Fumigant/VOC regs" Quick Link, or call the Ventura CAC at 805-933-8415.

## Field Fumigation Methods That Can Be Used in Ventura County in 2009

(includes method codes, emission ratings, and 3CCR references)

Between May 1 and October 31, only these methods are allowed in Ventura County.

The emission rating represents the percentage of the applied fumigant that volatilizes to air.

| Method Code        | Emission Rating (%) | 3CCR Section* and Field Fumigation Method  |
|--------------------|---------------------|--|
| <b>1100 series</b> |                     | <b>6447.3. Methyl Bromide Fumigation Methods (with or without chloropicrin)</b>      |
| 1103               | 48                  | 6447.3(a)(3) Tarpaulin/Shallow/Broadcast – Nobel Plow                                |
| 1107               | 48                  | 6447.3(a)(5) Tarpaulin/Deep/Broadcast  |
|                    |                     |  |
| <b>1200 series</b> |                     | <b>6448.1. 1,3-Dichloropropene Fumigation Methods (with or without chloropicrin)</b> |
| 1204               | 44                  | 6448.1(c)(3) Nontarpaulin/Shallow/Broadcast /Three Water Treatments                  |
| 1205               | 44                  | 6448.1(c)(4) Tarpaulin/Shallow/Bed/Three Water Treatment                             |
| 1206               | 26                  | 6448.1(c)(5) Nontarpaulin/Deep/Broadcast or Bed                                      |
| 1207               | 26                  | 6448.1(c)(6) Tarpaulin/Deep/Broadcast  |
| 1208               | 26                  | Tarpaulin/Deep/Bed   |
| 1209               | 19                  | 6448.1(c)(7) Chemigation (Drip System)/Tarpaulin                                     |
|                    |                     |  |
| <b>1100-1200</b>   |                     | <b>Chloropicrin Fumigation Methods</b>   |
| 1103               | 44                  | 6447.3(a)(3) Tarpaulin/Shallow/Broadcast – Nobel Plow                                |
| 1107               | 44                  | 6447.3(a)(5) Tarpaulin/Deep/Broadcast  |
|                    |                     |  |
| 1202               | 44                  | 6448.1(c)(2) Tarpaulin/Shallow/Broadcast   |
| 1204               | 43                  | 6448.1(c)(3) Nontarpaulin/Shallow/Broadcast /Three Water Treatments                  |
| 1205               | 43                  | 6448.1(c)(4) Tarpaulin/Shallow/Bed/Three Water Treatment                             |
| 1206               | 64                  |  |
| 1207               | 44                  | 6448.1(c)(6) Tarpaulin/Deep/Broadcast  |
| 1208               | 44                  | Tarpaulin/Deep/Bed   |
| 1209               | 12                  | 6448.1(c)(7) Chemigation (Drip System)/Tarpaulin                                     |
|                    |                     |  |
| <b>1400 series</b> |                     | <b>6450.1. Metam-Sodium and Metam-Potassium Fumigation Methods</b>                   |
| 1402               | 28                  | 6450.1(d)(2) Sprinkler/Broadcast or Bed/Two Water Treatments                         |
| 1403               | 21                  | 6450.1(d)(3) Sprinkler/Broadcast or Bed/Three Water Treatments                       |
| 1405               | 28                  | 6450.1(d)(5) Nontarpaulin/Shallow/Broadcast or Bed /Two Water Treatments             |
| 1406               | 21                  | 6450.1(d)(6) Nontarpaulin/Shallow/Broadcast or Bed/Three Water Treatments            |
| 1407               | 9                   | 6450.1(d)(7) Chemigation (Drip System) Tarpaulin                                     |
| 1408               | 9                   | Chemigation (Drip System) Nontarpaulin   |
| 1409               | 14                  | 6450.1(d)(8) Rotary Tiller   |
| 1410               | 14                  | Power Mulcher  |
| 1411               | 14                  | Soil Capping   |
| 1452               | 77                  | 6452(b)(1) Night Sprinkler/Broadcast or Bed/Two Water Treatments                     |
| 1455               | 28                  | 6452(b)(1) Night Nontarpaulin/Shallow/Broadcast or Bed/Two Water Treatments          |
|                    |                     |  |
| <b>1500 series</b> |                     | <b>6450.2. Dazomet Fumigation Methods</b>  |
| 1501               | 17                  | Soil incorporation   |
| 1502               | 17                  | Surface application – water incorporation  |
|                    |                     |  |
| <b>1600 series</b> |                     | <b>6451.1 Sodium Tetrathiocarbonate Fumigation Methods</b>                           |
| 1601               | 10                  | Chemigation (Drip)   |
| 1602               | 10                  | Chemigation (mini-sprinkler)   |
| 1603               | 10                  | Chemigation (flood, basin)   |
| 1604               | 10                  | Chemigation (furrow, border)   |
| 1605               | 10                  | Chemigation (foggers, jets, misters, other)  |

\*Refers to section in the California Code of Regulations (CCR), Title 3. The regulations contain more detailed descriptions of the methods. To read or download, go to [www.cdpr.ca.gov](http://www.cdpr.ca.gov), “A-Z Index,” “California Code of Regulations”

# Application to Obtain a Fumigant VOC Emission Allowance in Ventura County

☐ Check here if this is a supplemental request

Date: \_\_\_\_\_

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| Permittee / Business Name:                                      |                   |         |          |       | Operator Identification / Permit #:  |                     | Permittee Signature:   |                        |                        |                  | Phone #:                   |                          |
|---|-------------------|---------|----------|-------|--------------------------------------|---------------------|------------------------|------------------------|------------------------|------------------|----------------------------|--------------------------|
| Site Identification #   | Commodity Treated | Section | Township | Range | Product EPA / CA Registration Number | Product Name        | Application Rate/Acre* | Units (gals or lbs/ac) | Fumigation Method Code | Fumigated Acres* | Earliest Application Month | Latest Application Month |
|   |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |
|   |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |
|   |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |
|   |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |
|   |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |
|   |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |
| Additional Information Required for Supplemental Requests Only: |                   |         |          |       |                                      | Permittee Comments: |                        |                        |                        |                  |                            |                          |
| Pounds of additional emissions needed: _____                    |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |
| CAC Comments:   |                   |         |          |       |                                      |                     |                        |                        |                        |                  |                            |                          |

\* For application methods that treat only a bedded area, the fumigated acreage is the sum of the bed area and the furrow area. The application rate is the total pounds of fumigant product applied divided by the fumigated acreage.

Application Reviewed By: \_\_\_\_\_

Date: \_\_\_\_\_

## **FUMIGATION ALLOWANCE FORM INSTRUCTIONS**

1. This completed form must be received by the Ventura County Agricultural Commissioner (CAC) by March 20, 2009 if you intend to fumigate between May 1 through October 31, 2009.
2. You must provide specific pesticide product information, unless this is a supplemental request.
3. After you receive your initial allowance, you may use this same form to request a supplemental allowance. The Ventura CAC will reallocate any unused allowances on the first Monday of each month beginning in June. You do not need to specify a product, application rate, or fumigation method for a supplemental request, but you need to provide all other information. You must also calculate and specify the pounds of additional emissions (not product) needed. Instructions and tools to assist in calculating the emissions are available from the Ventura CAC or [www.cdpr.ca.gov](http://www.cdpr.ca.gov).
4. Failure to submit complete, accurate, and timely information to the Ventura CAC could prevent him/her from issuing you a permit to fumigate your fields for the permit year.
5. Contact the Ventura CAC as soon as possible if you have any questions about this form and/or the information required or to schedule an appointment to review your application. Phone (805) 933-2926.
6. Form can be submitted by mail or fax: Attn: Emission Allowance Request, PO Box 889, Santa Paula, CA 93061, fax: (805) 525-8922.

| <b>FUMIGATION METHOD CODES</b>                            |  |   |  |
|---|--|---|--|
| <b>Code</b>   | <b>Method</b>                                      | <b>Code</b>                             | <b>Method</b>  |
| <b>Methyl Bromide (with or without chloropicrin)</b>      |  | <b>Metam-Sodium and Metam-Potassium</b> |  |
| 1103  | Tarpaulin/Shallow/Broadcast – Nobel Plow           | 1402                                    | Sprinkler/Broadcast or Bed/Two Water Treatments          |
| 1107  | Tarpaulin/Deep/Broadcast                           | 1403                                    | Sprinkler/Broadcast or Bed/Three Water Treatments        |
|   |  | 1405                                    | Nontarpaulin/Shallow/Broadcast or Bed /Two Water Trtmts  |
|   |  | 1406                                    | Nontarpaulin/Shallow/Broadcast or Bed/Three Water Trtmts |
| <b>1,3-Dichloropropene (with or without chloropicrin)</b> |  | 1407                                    | Chemigation (Drip System) Tarpaulin                      |
| 1204  | Nontarpaulin/Shallow/Broadcast /Three Water Trtmts | 1408                                    | Chemigation (Drip System) Nontarpaulin                   |
| 1205  | Tarpaulin/Shallow/Bed/Three Water Trtmts           | 1409                                    | Rotary Tiller  |
| 1206  | Nontarpaulin/Deep/Broadcast or Bed                 | 1410                                    | Power Mulcher  |
| 1207  | Tarpaulin/Deep/Broadcast                           | 1411                                    | Soil Capping   |
| 1208  | Tarpaulin/Deep/Bed                                 | 1452                                    | Night 1 am Start/Sprinkler/Two Water Treatments          |
| 1209  | Chemigation (Drip System)/Tarpaulin                | 1453                                    | Night 4 am Start/Sprinkler/Two Water Treatments          |
|   |  |   |  |
| <b>Chloropicrin</b>                                       |  | <b>Dazomet</b>                          |  |
| 1103  | Tarpaulin/Shallow/Broadcast – Nobel Plow           | 1501                                    | Soil incorporation                                       |
| 1107  | Tarpaulin/Deep/Broadcast                           | 1502                                    | Surface application – water incorporation                |
|   |  | <b>Sodium Tetrathiocarbonate</b>        |  |
| 1202  | Tarpaulin/Shallow/Broadcast                        | 1601                                    | Chemigation (Drip)                                       |
| 1204  | Nontarpaulin/Shallow/Broadcast /Three Water Trtmts | 1602                                    | Chemigation (mini-sprinkler)                             |
| 1205  | Tarpaulin/Shallow/Bed/Three Water Trtmts           | 1603                                    | Chemigation (flood, basin)                               |
| 1206  | Nontarpaulin/Deep/Broadcast or Bed                 | 1604                                    | Chemigation (furrow, border)                             |
| 1207  | Tarpaulin/Deep/Broadcast                           | 1605                                    | Chemigation (foggers, jets, misters, other)              |
| 1208  | Tarpaulin/Deep/Bed                                 |   |  |
| 1209  | Chemigation (Drip System)/Tarpaulin                |   |  |